

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	No:
)	
v.)	VIOLATIONS:
)	
)	21 U.S.C. § 846 -
JOHN TAUTENHAN III)	Conspiracy to Distribute
RICHARD GONZALEZ)	Oxycodone
JENNIFER TOLEDO)	
[REDACTED])	21 U.S.C. § 841(a) -
)	Distribution of Oxycodone
Defendants.)	
)	21 U.S.C. § 853(a) -
)	Criminal Forfeiture

INDICTMENT

COUNT ONE: (21 U.S.C. § 846 - Conspiracy to Possess with
Intent to Distribute and to Distribute Oxycodone)

The Grand Jury charges that:

From in or about January 2016 and continuing until in or about
April 2016, at Southbridge and elsewhere in the District of
Massachusetts,

JOHN TAUTENHAN III and
RICHARD GONZALEZ,

defendants herein, did knowingly and intentionally combine, conspire,
confederate and agree with each other and with other persons both known
and unknown to the Grand Jury, to possess with intent to distribute
and to distribute oxycodone, a Schedule II controlled substance,
in violation of 21 U.S.C. § 841(a)(1).

All in violation of 21 U.S.C. § 846.

COUNT TWO: (21 U.S.C. § 846 - Conspiracy to Possess with Intent to Distribute and to Distribute Oxycodone)

The Grand Jury further charges that:

From in or about November 2015 and continuing until in or about April 2016, at Southbridge and elsewhere in the District of Massachusetts,

JOHN TAUTENHAN III,
JENNIFER TOLEDO, and
[REDACTED],

defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons both known and unknown to the Grand Jury, to possess with intent to distribute and to distribute oxycodone, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

All in violation of 21 U.S.C. § 846.

COUNT THREE: (21 U.S.C. § 841(a)(1) - Distribution of Oxycodone)

The Grand Jury further charges that:

On or about April 6, 2016, at Southbridge, in the District of Massachusetts,

JOHN TAUTENHAN III,

defendant herein, did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance.

All in violation of 21 U.S.C. § 841(a)(1).

COUNT FOUR: (21 U.S.C. § 841(a)(1) - Distribution of Oxycodone)

The Grand Jury further charges that:

On or about April 6, 2016, at Southbridge, in the District of Massachusetts,

RICHARD GONZALEZ,

defendant herein, did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance.

All in violation of 21 U.S.C. § 841(a)(1).

DRUG FORFEITURE ALLEGATION
(21 U.S.C. § 853)

The Grand Jury further charges that:

1. Upon conviction of one or more of the offenses charged in Counts One through Four of this Indictment,

JOHN TAUTENHAN III,
RICHARD GONZALEZ,
JENNIFER TOLEDO, and
[REDACTED]

defendants herein, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

2. If any of the property described in paragraph above, as a result of any act or omission of the defendants -

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

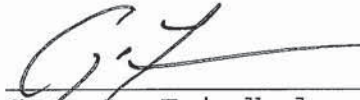
it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the

defendants up to the value of the property described in this paragraph.

All pursuant to 21 U.S.C. § 853.

A TRUE BILL


FOREPERSON OF THE GRAND JURY



Greg A. Friedholm
Assistant United States Attorney
District of Massachusetts

Dated: November 3, 2016

Returned into the District Court by the Grand Jurors and filed.

DEPUTY CLERK